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Pittsburgh's LTE Advance Cloud Network

The Truth About Interoperability

Promoting Interoperability in the 700 MHz Commercial Spectrum Band.

- The wireless industry (AT&T & Verizon) a government enabled duopoly.
- A duopoly that has been intentionally stonewalling interoperability unchecked for four years with misleading and deliberate incompatibility issues.
- Not the case of some accidental unknowing band class scheme but a strategic well orchestrated and extremely successful anti-competitive game plan.

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- Tigers don't change its stripes. The small license holders in the A block have no time to waste on the speculative nature that the industry will self regulate itself.
- Industry solutions to interoperability has been wholly ineffective and is a false promise demonstrated by the industry practice of using their dominance in the market to control the development and production of mobile devices that will only work in the 700MHz. spectrum band they hold.

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- Anti-competitive tactics of spreading uncertainty and doubt to deceive and encourage fragmentation of the 700 MHz. spectrum band with unsubstantiated claims of harmful interference from band class 12.
- Behavior that has substantially contributed to licensees difficulties of meeting the upcoming four year interim construction benchmark despite very meaningful efforts to put the lower A block 700MHz. spectrum to use in unserved areas of rural america.

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- The Commission has an obligation as regulators of the industry to enforce policies that protect small business from the harmful side effects of such unfairness which undermines the very principles and objectives of the Commission to promote competitiveness in the mobile industry.
- The Commission must not underestimate the impact of not having interoperability in the 700MHz. band highlighted by the hundreds of comments that have been submitted in this proceeding.

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- The Commission must take action to resolve the problem of interoperability in the 700MHz. spectrum band and immediately freeze the equipment authorization on equipment that can not operate on all of the spectrum frequencies in the 700 MHz band.
- The Commission has available an avalanche of data that supports mandatory interoperability in the 700MHz. band any additional delays is unnecessary and will have severe consequences for the smaller carriers and consumers alike.

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- This is an opportunity for the commission to address the underlying competitive issues in the wireless market and to make sure that interoperability in the 700MHz. band becomes a reality.
- We urge the Commission to address interoperability expeditiously given the long time needed to construct a greenfield mobile network. For the benefit of consumers the Commission should take steps to ensure that smaller players have the ability to compete by adopting interoperability in the 700MHz. band

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